

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

**UNITED STATES OF AMERICA,**

Plaintiff,

vs.

SETH M. BOURGET and  
JOSEPH M. LAVORATO,

Defendants.

**Criminal No. 20-10029-DJC**

**GOVERNMENT'S MOTION TO UNSEAL  
INDICTMENT**

The United States of America hereby moves this Court to direct that the indictment be unsealed. In support of this motion, the government states that the defendant was arrested on February 6, 2020, and that there is no further reason to keep the indictment secret.

Respectfully submitted,

ANDREW E. LELLING  
United States Attorney

By: /s/ Neil Gallagher  
Neil J. Gallagher, Jr.  
Assistant U.S. Attorney

Date: February 6, 2020